

CONTINUATION IN SUPPORT OF CRIMINAL COMPLAINT

I, Richard Suda, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this continuation in support of a criminal complaint against Todd Stafford for violation of Title 18, United States Code, Sections 2422(b), for using a facility of interstate commerce, namely electronic mail and a cellular telephone, to entice an individual under the age of 18 to engage in a sexual act with him; and 2423(b), for traveling in interstate commerce with the intent to engage in sex with the minor. Based on the information disclosed below, I submit there is probable cause to believe that beginning in June of 2023 and continuing through July 21, 2023, Stafford violated Title 18, United States Code, Sections 2422(b and 2423(b) in the Western District of Michigan. I, therefore, request the Court authorize the criminal complaint and an arrest warrant for Stafford.

2. I am a Special Agent with the FBI and have been since February 2023. I am currently assigned to the Marquette Resident Agency in Marquette County, Michigan. In my employment as an FBI Special Agent, I have received training in investigating various types of Federal criminal violations, including sexual assault and computer crimes. Prior to being hired by the FBI, I was employed by the Ohio Department of Public Safety as a State Trooper. During my almost 7 years of employment as an Ohio State Trooper, I completed many criminal investigations including investigations in vehicular homicide, aggravated assault, and various weapons related offenses.

3. This continuation is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

1. On July 12, 2023, the Iron Mountain Police Department (IMPD) had an individual arrive at the department to file a report. The complainant reported that her son (Victim, a 15-year-old minor) had been communicating with an older male via smartphone. Victim's mother and father discovered the relationship after looking through Victim's smartphone. Victim's mother found messages between the Victim and a man identified as "Chris." The messages on the phone showed that "Chris" was attempting to meet with Victim at a hotel. Victim's mother stated that Victim admitted to his parents that he had met "Chris" and that "Chris" was approximately his father's age. IMPD scheduled a forensic interview of Victim.

2. On July 13, 2023, Victim met with Karla Lehmann at the Child Advocacy Center (CAC) to complete a forensic interview. During the interview, Victim stated that he met a man he knew as "Chris," but who investigators have now determined to be Stafford, on a website used for meeting up with people. Victim described "Chris" as being in the Navy, in his thirties or forties, approximately 5'9" or 5' 10", wearing square frame glasses, brownish hair combed over, average build, and a mole on his neck. Victim described "Chris's" vehicle as a newer, silver, Toyota Prius with four doors, having military uniforms hanging in the windows, no name bar on the uniforms. Victim said that "Chris" used his phone to show him a picture of his other vehicle, a maroon pickup truck, Chevrolet or GMC. Victim and "Chris" communicated with Victim via email, with Victim using his smartphone to send and receive messages. Victim received messages from the email account manchris14@yahoo.com, who the victim believed to be "Chris." Victim stated that "Chris" said he lived in a cabin in Wisconsin. Victim stated that he told "Chris" that he was under the age of 18. "Chris" acknowledged Victim with an ok.

3. Victim talked about his contact with "Chris" on July 1, 2023. "Chris" picked up

Victim in a Silver Toyota Prius. “Chris” drove Victim to a McDonald’s restaurant in Iron Mountain, MI, and to the Mountain Host Motor Inn in Iron Mountain, MI. Victim explained to the forensic interviewer that he engaged in “anal and oral.” Specifically, Victim explained that “Chris” performed anal and oral sex on Victim, and Victim performed oral sex on “Chris.” After approximately an hour, “Chris” drove Victim back to an area near Victim’s residence and dropped him off.

4. “Chris” attempted to contact Victim via email after July 1, 2023. Victim’s father took Victim’s cell phone from him and was able to obtain “Chris’s” smartphone number and email address. On the way to the forensic interview, Victim recognized the hotel “Chris” took him to as Mountain Host Motor Inn.

5. Victim’s parents granted consent to IMPD to look through Victim’s cell phone. IMPD discovered email messages between the Victim and manchris14@yahoo.com (email address used by “Chris”). On June 20, 2023, “Chris” wrote to Victim, using email account manchris14@yahoo.com, “DAMMMMM I want to Spend a Night with You SOOOOOO BAD!!! (kissing face emoji). On June 29, 2023, “Chris” wrote to Victim, using email account manchris14@yahoo.com, “Hey (redacted name of Victim), I CAN’T WAIT to see You again on Saturday also (eye rolling emoji, smiling emoji, and drooling smiling emoji) So I’ll be there in Iron Mountain In the Late Afternoon Saturday the 01st of July and we can Meet up for Dinner and then To My Hotel Room for Me to Give You a Massage and Spend the Night Pleasuring Each Other!” (eye rolling emoji, smiling hug emoji, and drooling smiling emoji). “Chris” also said “If You Can and Want to Text me, You are MORE THAN WELCOME TO (630-618-7906), but if Not I Understand, But let me know so I can Appropriately communicate with You, Ok (thumbs up emoji) Chris.” IMPD observed a series of email messages between “Chris” and

Victim on July 1, 2023, discussing pick up arrangements. After taking Victim's phone away, Victim's father continued to communicate with "Chris" via text message. "Chris" unknowingly spoke with Victim's father using the phone number 630-618-7906. On July 10, 2023, Victim's father (as Victim) messaged "Chris," "Hey Chris it's (redacted name of Victim). New number". Victim's father (as Victim) sent a message to "Chris" containing a clothed image of Victim. "Chris" responded "Loved an image". Victim's father (as Victim) to "Chris," "I want one (winking emoji). "Chris" in response, "YUMMMMMMY! That Just GAVE ME A SUPER BONNER (drooling emoji, star eyed emoji)", followed by "You Want one What?" Victim's father (as Victim) responded, "A pic, I miss you". "Chris" responded with a picture image. The image was of an erect male penis, taken from a downward angle. The photograph also showed a gray floor with a pattern consistent with wood flooring, a white wall with light brown trim by the floor, two polished silver supports consistent with stool supports, and a rug with frayed edges and a design.

6. On July 21, 2023, IMPD took over communications with "Chris" through Victim's email address and what "Chris" believed to be the Victim's phone number. IMPD, as Victim, made an arrangement to meet with "Chris" at the Iron Mountain City Park at "645". IMPD (as Victim) to "Chris", "What are you driving" followed by "Walking now". "Chris" responded, using email account manchris14@yahoo.com, "Same Vehicle as Before". IMPD (as Victim), "What do you want to do", and then "Are you there". "Chris" to IMPD (as Victim), "Talk when I see you, Ok" (message also included a thumbs up emoji). IMPD (as Victim) would message "Chris," "At the tennis court", and later "ok it's off to the side. There were people at the playground" and "Are you here". "Chris" responded to IMPD (as Victim), "Yes". Shortly after, "Chris," later identified as Todd Stafford (Stafford), arrived at the Iron Mountain City Park

tennis courts, driving a silver Toyota Prius. IMPD arrested Stafford using both marked and unmarked police officers.

7. After the arrest of Stafford, IMPD removed an Apple iPhone from his right front pocket. Stafford requested IMPD secure a second cell phone. This second cell phone, also an Apple iPhone, was located in the center console of the silver Toyota Prius. The vehicle itself, a silver 2020 Toyota Prius, had a Wisconsin (WI) registration of AMP3895, and a Vehicle Identification Number (VIN) of JTDL9RFU3L3018805. The vehicle was registered to another individual at an address in Baileys Harbor, WI 54202. This address is also listed as Stafford's address through the Wisconsin Department of Transportation. Edwards Automotive removed the vehicle from the scene, and it was secured in the IMPD garage.

8. On July 28, 2023, United States Postal Inspection Service (USPIS) Postal Inspector Derik Thieme confirmed that Stafford and the registered car owner are currently receiving mail at the same address in Baileys Harbor, Wisconsin 54202. Stafford and the other registered car owner requested USPS forward mail from an address in Augustine Florida 32086 to the Baileys Harbor, Wisconsin 54202, address from April 19, 2023 to September 30, 2023. On this same day, a Door County Sheriff's Office Deputy, of Door County Wisconsin, went to the Baileys Harbor, Wisconsin residence and attempted to contact the car owner. During the attempt, the Deputy observed a blue Chevrolet pickup truck, with Wisconsin Registration of NW8839, parked in the driveway. This vehicle returned through the Wisconsin Department of Motor Vehicles with Stafford as the registered owner.

9. On August 1, 2023, Victim completed a second forensic interview with Karla Lehmann at the Dickinson County CAC. During this second interview, Victim disclosed that he had met Chris another time prior to July 1, 2023. Victim was unsure of the date but believed it to

be around Spring Break in 2023. During this encounter, Victim was picked up by “Chris” at an intersection near his home and taken to the Mountain Host Motor Inn. Victim remembered the room being on the second floor but did not recall a specific room. Once in the room, “Chris” gave Victim a massage. After this, “Chris” took Victim back to the same intersection he was picked up from.

10. On August 3, 2023, investigators searched Stafford’s residence in Baileys Harbor, WI. During the search, photographs were taken of items that matched the background of a photograph Stafford had sent to Victim. The photograph sent to Victim was of an exposed male penis, also showing specific flooring, carpet, trim, and stool supports. Items matching this description were found in the residence, and photographs were taken of the evidence.

11. In my training and experience, I know that electronic mail and cellular telephones are instruments of interstate commerce. Based on the facts relayed above, I believe that Stafford traveled from his residence in Wisconsin to Iron Mountain, in the Western District of Michigan to engage in sex with Victim, and that he used his electronic mail and his cellular phone in order to entice Victim to do so, in violation of Title 18, United States Code, Sections 2422(b) and 2423(b).

CONCLUSION

12. I submit that this continuation supports finding that there is probable cause to believe that Stafford committed a violations of 18 U.S.C. § § 2422(b) and 2423(b).I, therefore, request that the Court authorize the criminal complaint and issue an arrest warrant for Stafford’s arrest.